



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

DEC 28 2011

REPLY TO THE ATTENTION OF:

E-19J

James Thompson, District Ranger
Huron-Manistee National Forests
1755 South Mitchell Street
Cadillac, Michigan 49601

Re: Comments on the Draft Supplemental Environmental Impact Statement for the Land and Resource Management Plan for the Huron-Manistee National Forests, Michigan
EIS No. 20110323

Dear Mr. Thompson:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's (USFS) Draft Supplemental Environmental Impact Statement (EIS) for the above-mentioned project. Our comments in this letter are provided in accordance with our responsibilities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Huron-Manistee National Forests Land and Resource Management Plan (Plan), revised in 2006, analyzed environmental effects of proposed changes to management of natural resources. The 2006 Plan and Final EIS were administratively appealed, culminating in a lawsuit filed with the U.S. Court of Appeals for the Sixth Circuit (the *Meister* Panel). The *Meister* Panel found deficiencies in the Forest Service's application of the agency's planning, the Recreation Opportunity Spectrum (ROS), as well as with the agency's evaluation of firearm hunting and snowmobiling activities. Specifically, the *Meister* Panel determined that these "noisy" activities were allowed to occur in or near "quieter" areas of the Forests. The *Meister* conclusion was that the 2006 Plan analysis was deficient in that the Forest Service failed to correctly apply the ROS standards in its analysis of recreation activities allowed in Semiprimitive Nonmotorized and Wilderness areas. This Draft Supplemental EIS was written to supplement the 2006 Plan analysis, correct deficiencies identified by the *Meister* panel, and respond to significant issues raised by the public in response to the Forest Service's Notice of Intent to prepare this Draft Supplemental EIS.

The Draft Supplemental EIS evaluates four alternatives to address non-conforming characteristics with ROS classifications:

- Retain existing Management Area designations to accomplish goals (No Action alternative);
- Close 14 Management Areas to firearm hunting and snowmobiling activities (Alternative 2);
- Align Management Area designations with 2011 ROS classification causing 13 Management Areas to change designation (Alternative 3); and
- Change 12 Management Area designations to manage for a less roaded recreational experience while retaining firearm hunting opportunities (Alternative 4).

Based on our review of the Draft Supplemental EIS and supporting documentation, the Draft Supplemental EIS appears to have adequately addressed the purpose and need. Nevertheless, EPA has assigned a rating of “Environmental Concerns – Insufficient Information,” or “EC-2” to this document. We recommend language to clarify the following be included in the Final EIS or the Record of Decision (ROD). Enhancing these statements would be beneficial for reviewers to understand the rationale for the statements and, ultimately, for the decision concerning this action. Our summary of ratings definitions is enclosed.

Chapter 3. Affected Environment and Environmental Consequences – The introduction to this chapter indicates the Draft Supplemental EIS will consider the direct effects of each proposed alternative within each of the areas being studied and within approximately a 1-mile radius around each area. Likewise, a 5-mile radius around each study area was set to consider indirect effects of each proposed alternative. As a result of conversations between members of the Forest Service Interdisciplinary Team and Kathy Kowal of my staff, it was revealed that the 1-mile and 5-mile radius buffers came from the Sixth Circuit decision. Including this explanatory item into the Final EIS/ROD would allow reviewers to understand why buffers were set around study areas for this analysis as opposed to other EISs produced by the Forest Service.

Chapter 3. Affected Environment and Environmental Consequences, Karner Blue Butterfly (KBB) – We recommend adding to this section a discussion that quantifies potential effects of a firearm hunting ban on KBB habitat. This discussion should include the number of acres and percentages of KBB habitat in the 14 Management Areas that could be negatively affected by increased deer populations as a result of a firearm hunting ban. Such information would allow the reviewer to put into perspective potential adverse impacts to KBB habitat managed under the KBB Recovery Plan.

Chapter 3. Affected Environment and Environmental Consequences, Supplemental Supply and Demand Analysis – One of the three primary data sources used for the Supply and Demand Analysis is the *Outdoor Recreation for 21st Century America* (Cordell et al. 2004). Through discussions with the Interdisciplinary Team, we understand this document is not revised periodically (e.g., every five or ten years). Because outdoor recreation can fluctuate with societal trends and economic conditions, we feel it is important to state why a more recent supply and demand analysis from this author is not part of the Draft Supplemental EIS analysis.

We appreciate the opportunity to review these documents, and we look forward to receiving a copy of the Final Supplemental EIS and ROD. We look to the Final Supplemental EIS and ROD to disclose the rationale for selecting the preferred alternative. If you have any questions concerning these comments, please contact me or Kathy Kowal ((312) 353-5206 or kowal.kathleen@epa.gov).

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

cc: James McDonald, Regional Environmental Coordinator, USFS, Milwaukee, Wisconsin
Enclosure: Summary of Ratings Definitions